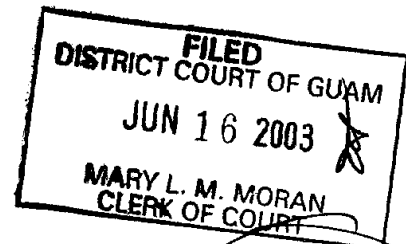


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6



7 DISTRICT COURT OF GUAM  
8 TERRITORY OF GUAM  
9

10 Tony H. Ashtiani, )  
11 )  
Plaintiff, ) Civil Case No.: 02-00032  
12 )  
Vs. )  
13 ) PLAINTIFF FIRST REQUEST OF THE  
Continental Micronesia Inc, ) PRODUCTION OF DOCUMENTS TO  
14 ) DEFENDANT CONTINENTAL  
Db, Continental Micronesia, ) MOCRONESIA INC,  
15 )  
Continental Airlines, ) Fed R. Civ P. 34  
16 )  
Defendant )  
17 )  
18 )  
19 )

20 TO: DEFENDANT CONTINETAL MICRONESIA INC., AND ITS ATTORNEYS OF  
21 RECORD: Plaintiff hereby request pursuant to Fed R Civ P rule 34,  
22 Plaintiff requests that Defendant respond in writing, under  
23 oath, to the following Requests for Production of Documents  
24 within 30 days from the service and this request, and produce  
25 and permit inspection and copying of documents described below  
on July 15 , 2003. At 0900 A.M to plaintiff at Guam Law Library

1 at 141 San Ramon street Conference room B Hagatna, Guam. In  
2 lieu of producing the documents for inspection, defendant may  
3 forward legible copies of them to plaintiff on or before the  
4 date of production, except that defendant must label all  
5 documents (e.g. Exhibit A, B, C, etc.). And indicate in  
6 writing which documents are responsive to which requests).  
7 As an alternative earlier means of production, defendant may  
8 photocopy all responsive documents and deliver the same to the  
9 plaintiff on or before the date set for production. Defendants  
10 and the counsel of records are reminded of their obligations  
11 under rule 34 of the Federal rule of civil procedure.  
12 Terms are defined in accordance with Rule 1001 of Rules of  
13 Evidence.

#### 14 15 DEFINITION AND INSTRUCTION

16 The word "document is used in these requests in the broad  
17 and liberal sense and means any written, typed, recorded or  
18 graphic matter, however produced or reproduced, of any kind and  
19 description, whether sent, received, or neither, and all copies  
20 thereof which differ in any way from the original (whether by  
21 interlineations, stamped received, notation, indication of copy  
22 sent or received, or otherwise) regardless of whether designated  
23 confidential, privileged or otherwise and whether such is an  
24 original, master, duplicate or copy, including, but not limited  
25 to, papers, notes, accounts statements or summaries, ledgers,

1 pamphlets, periodicals, books, advertisements, drawings,  
2 telegrams, audio or video tape recordings, communications,  
3 including inter-office and intra office memoranda, delivery  
4 tickets, bills of lading, invoices, quotations, claims  
5 documents, reports, records, studies, work sheets, working  
6 papers, corporate records, minutes of meetings, circulars,  
7 bulletins, notebooks, bank deposit slips, bank check, canceled  
8 checks, data processing cards and/or tapes, computer software,  
9 electronic mail messages, photographs, transcriptions or sound  
10 recordings of any type of personal or telephone conversations,  
11 interviews, negotiations, meetings or conferences, or any other  
12 things similar to any of the foregoing.

13       The term "communication" as used in these requests means  
14 any words heard, spoken, written or read, regardless of whether  
15 designated confidential, privileged or otherwise, and including,  
16 without limitation, words spoken or heard at any meeting,  
17 discussion, interview, encounter, conference, speech,  
18 conversation or other similar occurrence, and words written or  
19 read from any document(s) as described above.

20       The term "person" as used in these requests means  
21 individuals or entities or any type, including but not limited  
22 to, natural persons, governments (or agencies thereof), quasi-  
23 public entities, corporations, partnerships, groups, mutual or  
24 joint ventures and other forms of organizations or associations.  
25

1       The term "date" as used in these requests shall mean the  
2 exact day, month and year, if ascertainable, or if not the best  
3 approximation thereof (including by relationship to other  
4 events).

5       As used herein, the words or phrases, "explaining,"  
6 "describing," "defining," "concerning," "reflecting," or  
7 "relating to" when used separately or in conjunction with one  
8 another mean, directly or indirectly, mentioning, pertaining to,  
9 involving, being connected with or embodying in any way or to  
10 any degree the stated subject matter.

11       The term "relate to," or any similar phrase, shall mean  
12 refer to, reflect on, concern or be in any way logically or  
13 factually connected with the matter discussed.

14       The term "employee" means any person who receives wages, a  
15 salary or other income, in any form, from the defendant,  
16 including, without limitation, supervisors, administrators,  
17 manager, directors, officers, board of directors members,  
18 contract workers, commission workers or any combination thereof.

19       For each document encompassed by these requests which  
20 defendant claims to be privileged from or otherwise protected  
21 against discovery on any ground, defendant shall expressly make  
22 the claim, fully setting forth all grounds for the privileged or  
23 protection and shall expressly describe the document with a  
24 degree of specificity that will enable pro se plaintiff to  
25 assess the applicability of the claimed privilege or protection.

1        If a request is made for production of documents which are  
2 no longer in the possession, custody and/or control of  
3 defendant, state when such documents were lost, destroyed or  
4 otherwise disposed of; how recently where they in the  
5 possession, custody and/or control of defendant and what  
6 dispositions were made of them, including the identity of the  
7 person(s) believed to be last or presently in possession,  
8 custody and/or control of the documents. If a document has been  
9 destroyed, if applicable, state when such document was  
10 destroyed, identify the person(s) who destroyed the documents,  
11 and the person(s) who directed that the document be destroyed  
12 and the reasons the document was destroyed.

13        Unless otherwise specified, each request requires a full  
14 response for every and entire period of time with respect to  
15 which defendant intends to offer any evidence.

16        If more than one copy of a requested document (e.g., a  
17 clean copy and a copy with handwritten or other notations)  
18 exists, and if one or more documents have any writing on them,  
19 which differentiate them from other copies, defendant shall  
20 produce all copies.

21        These document requests are continuing and, if at any time  
22 subsequent to production of documents requested herein, any  
23 document responsive to this request is located or comes within  
24 the custody, possession or control of the defendant, plaintiff  
25

1 requests that it forthwith be produced to the full extent  
2 required by Rule 34 of the Federal Rules of Civil Procedure.  
3  
4

5 **REQUESTED DOCUMENTS**  
6

7 1. All documents, notes, recordings, data compilations  
8 and all files or other collections of documents, official or  
9 unofficial, formal or informal, maintained or kept by Defendant,  
10 or by any agent, attorney, employee, independent contractor,  
11 representative, or board member thereof, or otherwise in its or  
12 their possession, custody or control, relating or pertaining in  
13 any way to the plaintiff, including, without limitation, all of  
14 plaintiff's personnel files and documents, plaintiff's transfer  
15 document, plaintiff's administrative file maintained by  
16 defendant's Human Resources Department or any other department  
17 or subdivision, representative or agent, and any other  
18 departmental files relating or pertaining in any way to the  
19 plaintiff.

20 2. All documents pertaining to plaintiff's job  
21 performance and/or salary or compensation history as an  
22 employee, including, without limitation, each document reviewed,  
23 referred to, considered, or utilized in any way in the  
24 preparation of plaintiff's performance reports.  
25

1        3.        Copy of all (a) P-160s (b) P-187 of Mr. Dixon McKenzie,  
2 Human Resources Director.

3        4.        Copy of all P-160s (b) P-187 of Mr. James Hammer  
4 director of maintenance.

5        5.        Plaintiff's statement which was requested by and given  
6 to Mr. William Herrera on the evening of June 26, 2001  
7 explaining plaintiff's position relevant to the absence from  
8 duty.

9        6.        Copy of the return receipt of the U.S.P.S certified  
10 letter (PS form 3811) signed by the plaintiff on July 12, 2001  
11 which contained plaintiff's termination letter dated July 03,  
12 2001 signed by Mr. Herrera.

13       7. (a) All document of 1 thru 6 levels of attendance records  
14 and counseling notice of which were received by plaintiff; (b)  
15 list of witnesses and attendees whom were present at such  
16 meetings, including employer's representative, employees, and  
17 union representative; and (c) the jointly filled out discussion  
18 form(s) (which, at the end of each such meeting all parties  
19 acknowledged such meeting and signed the mentioned form).

20       8.        Documents of plaintiff's employee evaluation and/or  
21 progress reports from defendant's Technical Services Division,  
22 where plaintiff worked and employer provided this form during  
23 evaluation as plaintiff had acknowledged and signed of employer  
24 expectation from the plaintiff (referred to therein as,  
25 "employee").

1       9.       Please provide dates [??] in regard to each and every  
2 DC-10-30 exiting the fleets of Continental Micronesia inc.,

3       10.       Please provide the list of all off-island trainings of  
4 plaintiff's mechanics including the list the names of the  
5 mechanics, their nationality, race, and ethnicity.

6       11.       Please provide list of names of all defendant's  
7 employees who attended the off island General electric engine  
8 trainings, as well as their experience and comprehension of the  
9 complex engine and hand on experience, and their race,  
10 nationality and ethnicity.

11       12.       Please provide the monthly shift schedules for  
12 mechanics working swings, early swings, early graveyard, and  
13 regular graveyard shifts, from the period of June 1997 to  
14 present.

15       13.       Please provide a list of names of all mechanics,  
16 mechanic helpers, Airframe mechanics, sheet metal mechanics,  
17 sheet metal mechanic helpers, tool crib attendants either in the  
18 Technical Services Division of terminal line or B CHECK that  
19 were under the union contract of Continental Micronesia Inc, and  
20 International Brotherhood of Teamsters who were employed by the  
21 defendant who had two or more consecutive No call/No show from  
22 the period from Jun 1990 to the present.

23       14.       Defendant's personnel and/or operating policies and/or  
24 procedures in existence during plaintiff's employment and all  
25 documents relating or pertaining thereto, including, without



1 limitation, each version of defendant's policies and/or  
2 procedures on compensation, salary increases, bonuses, job  
3 performance, performance evaluations, and equal employment  
4 opportunity and retaliation for complaints of discrimination and  
5 disparate treatments.

6 15. Defendant's policies and/or procedures on  
7 discrimination and harassment and/or any other discrimination in  
8 existence at any time during plaintiff's employment, and all  
9 documents relating or pertaining thereto, including, without  
10 limitation, each version of any discrimination policy or  
11 procedure in effect during plaintiff's employment and each draft  
12 thereof, and all documents referring or relating to training,  
13 supervision, discipline of, or instruction to defendant's  
14 officers, employees, independent contractors, representatives,  
15 and/or board members on or about discrimination, harassment  
16 and/or disparate treatments.

17 16. All documents referring, relating to, describing or  
18 explaining, any suggestion, allegation, charge or complaint of  
19 discrimination, harassment, disparate treatment (regardless of  
20 how defendant characterizes the suggestion, allegation, charge  
21 or complaint, and whether formal or informal), made by any other  
22 employee, supervisor or management personnel of defendant during  
23 plaintiff's employment, including, without limitation, any  
24 suggestion, allegation, charge or complaint that defendant, Mr.  
25 Dixon McKenzie, James Hammer , Mr. William Herrera , Mr. Glenn

1 Mendoza or any other officer, employee, independent contractor,  
2 representative or board member thereof, (allegedly or actually)  
3 discriminated ,harassed any employee, officer, supervisor on any  
4 other person during plaintiff's employment.

5 17. Defendant's policies and/or procedures on racial  
6 and/or national origin discrimination in existence at any time  
7 during plaintiff's employment, and all documents relating or  
8 pertaining thereto, including, without limitation, each version  
9 of any racial or national origin discrimination policy or  
10 procedure in effect during plaintiff's employment and each draft  
11 thereof, and all documents referring to relating to training,  
12 supervision, discipline of, or instruction to defendant's  
13 officers, employees, independent contractors, representatives,  
14 and/or board members on or about racial and/or national origin  
15 discrimination.

16 18. All documents referring or relating to, or describing  
17 or explaining, any suggestion, allegation, charge or complaint  
18 of racial and/or national origin discrimination (regardless of  
19 how defendant characterizes the suggestion, allegation, charge  
20 or complaint, whether formal or informal), made by any other  
21 employee, supervisor or management personnel of defendant during  
22 plaintiff's employment, including, without limitation, any  
23 suggestion, allegation, charge or complaint that defendant, Mr.  
24 Dixon McKenzie and Mr. James Hammer or any other officer,  
25 employee, independent contractor, representative, or board

1 member thereof, discriminated against any employee, officer,  
2 supervisor or any other person during plaintiff's employment on  
3 the basis of race or national origin.

4 19. All documents referring or relating to salary  
5 increases and/or bonuses for all maintenance supervisors, and  
6 aircraft mechanics for the period of June 1998 to the present,  
7 including, without limitation, all documents describing or  
8 explaining the method or process, if any, by which defendant  
9 made determinations as to salary increases and/or bonuses for  
10 its employees during this same period.

11 20. All documents referring to or relating to salary,  
12 bonus and/or compensation histories of each maintenance  
13 supervisor employed by defendant in the period of June 1998 and  
14 to the present.

15 21. All documents referring or relating to promotion of  
16 the Human Resources Department management staff, including but  
17 not limited to, Mr. Dixon McKenzie, Mr. Robbie Crisostomo, and  
18 Theresa Sage, including the dates of promotion and date of  
19 transfer from any other department to Human resources Department  
20 of Continental Micronesia, Inc., and those of Continental  
21 Airlines, that transferred to Continental Micronesia, Inc.

22 22. All documents referring or relating to compensation  
23 grades, which have been established by defendant for  
24 compensation, including, without limitation, employment records  
25

1 showing compensation grade and actual salary for Mr. Mckinzie  
2 and Mr. Hammer.

3 23. All documents, and all files or other collections of  
4 documents, official or unofficial, formal or informal,  
5 maintained or kept by defendant, or by any employee, independent  
6 contractor, representative, or board member thereof, or  
7 otherwise in its or their possession, custody or control,  
8 relating or pertaining to the Mr. Dixon McKenzie and Mr. James  
9 Hammer, including, without limitation, all of their personnel  
10 files, their P-160's, the employees administrative file  
11 maintained by the Human Resources Department and any  
12 departmental or company files.

13 24. All documents referring or relating to Mr. Dixon  
14 McKenzie and Mr. James Hammer participation or involvement in  
15 decision-making concerning any employee's employment, including,  
16 without limitation, decisions relating to salary, promotion,  
17 bonuses, hiring layoff or firing.

18 25. All organizational descriptions or charts reflecting  
19 the defendant's organizational structure, including without  
20 limitation, each individual department's organizational  
21 structure for the period from June 1998 to the present.

22 26. All position descriptions or other documents referring  
23 or relating to the duties and responsibilities of each position  
24 of employment with defendant's organization from June 1998 to  
25 present.

1       27.       All documents that state, reflect, describe or  
2 evaluate, in whole or in part, the net worth of defendant,  
3 including, without limitation, documents listing or describing  
4 defendant's assets from which net worth independently may be  
5 ascertained, and any current financial statements reflecting  
6 defendant's assets and/or liabilities.

7       28.       All minutes of meetings of defendant's board of  
8 directors and/or officers attended by Mr. Dixon McKenzie and Mr.  
9 James Hammer and all minutes of meetings of defendant's board of  
10 directors and/or officers during which any reference was made to  
11 any one or more of the following: Plaintiff, Mr. Dixon McKenzie,  
12 Mr. James Hammer, Mr. Bill Herrera and Mr. Glenn Mendoza which  
13 contain any reference to or mention plaintiff filing charge with  
14 EEOC, plaintiff's civil action, plaintiff's termination,  
15 plaintiff's allegations that he was harassed, plaintiff's  
16 allegations that he was discriminated against, discrimination  
17 and/or differences in treatment between pacific islanders,  
18 Caucasians ,Blacks, Middle easterners or any other ethnic group  
19 or minority, any religious group including but not limited to,  
20 any Muslim group or employees.

21       29.       All documents referring or relating, or the raw data  
22 from which the information may be compiled proving or disproving  
23 the existence of any differences or variations in grade, salary,  
24 bonuses and promotions between persons of Pacific Island origin  
25 and Caucasians, blacks, and Middle easterners between persons of

1 Pacific Island origin and Continental Airlines, Inc.'s  
2 employees, or between employees of defendant and Continental  
3 Airlines, Inc., or between persons who were residents of Guam at  
4 the time they were hired and persons hired from off-island.

5 30. All documents in regards to or which in any manner  
6 refer to or mention the transfer of any aircraft mechanics from  
7 Continental Airlines, Inc., to Continental Micronesia Inc., and  
8 any documents in regards or which in any manner refer to or  
9 mention their pay scale; and whether equal pay was applied for  
10 performing the same job in the same job classification, during  
11 period of August 1991 to the date of plaintiff's termination.

12 31. The P-160's for every supervisor, officer, director or  
13 any other supervisory or management personnel of defendant for  
14 the period of Jun 1998 to the present, in the technical services  
15 division, Maintenance, quality control and quality assurance  
16 division of Continental Micronesia Inc.

17 32. The P-160's for all defendant's supervisors that were  
18 (a) promoted in period of June 1998 to September 11, 2001; and  
19 (b) those supervisor that were furloughed or laid off after  
20 September 11, 2001 up to January 10 , 2002. Please provide  
21 their names, their race, nationality, and their ethnicity of all  
22 such individuals who were furloughed in the Technical Services  
23 Division, Maintenance, Quality control and Quality Assurance  
24 Division of Continental Micronesia, Inc.

1        33.        All written and/or computerized and/or electronic  
2 communications or other documents, including electronic mail  
3 messages, to or from, or intended to be to or from, any officer,  
4 employee, independent contractor, representative, or board  
5 member of defendant regarding plaintiff and/or plaintiff's  
6 complaint, whether such communication was addressed to such  
7 person or not and whether such communication was actually  
8 delivered to such person or not.

9        34.        All written and/or computerized and/or electronic  
10 communications or other documents, including electronic mail  
11 messages, to or from, or intended to be to or from, any officer,  
12 employee, independent contractor, representative, or board  
13 member of defendant regarding Mr. Dixon McKenzie and Mr. James  
14 Hammer, whether such communication was addressed to such person  
15 or not and whether such communication was actually delivered to  
16 such person or not.

17        35.        All documents or computerized surveys which was done  
18 by any means, including but not limited to, electronic means and  
19 referred to as survey by the maintenance supervisors in Guam of  
20 their director Mr. James Hammer. Please provide the copy of the  
21 surveys from each and every supervisor and identify which survey  
22 belongs to which supervisor.

23        36.        All documents and statement from James Hammer in  
24 regards to making any racial comments either after September 11,  
25 2001 or before September 11, 2001 to any one employed by the

1 defendant before or after Plaintiff's termination, in reference  
2 to plaintiff.

3 37. All documents, which relate or pertain to the factual  
4 basis for any defense, including, without limitation, any  
5 affirmative defense, defendant asserts in this civil action.

6 38. All documents which relate or pertain to any  
7 suggestions, proposals, plans, projects or other activities  
8 concerning defendant's treatment of persons of Pacific Island  
9 origin, Blacks, whites, Middle Easterners including, without  
10 limitation, to proposals, programs, suggestions or plans to  
11 remedy differences in treatment of pacific islanders,  
12 Micronesian, Blacks, and Middle Eastern employed by defendant.

13 39. All documents which defendant contends support or  
14 constitute evidence supporting any defense, including, without  
15 limitation, any affirmative defense, defendant asserts in this  
16 civil action.

17 40. All documents which defendant contends reflect or  
18 relate to any alleged job performance deficiency of plaintiff.

19 41. All documents referring or relating to, or describing  
20 or explaining, any investigation by any individual or entity,  
21 including, without limitation, defendant or Continental  
22 Airlines, Inc., of any suggestion, allegation, charge or  
23 complaint that Mr. Dixon McKenzie and any other Maintenance  
24 Supervisor, at the time of plaintiff employed by the defendant,  
25 harassed (regardless of how defendant characterized, the



1 suggestion, allegation, charge or complaint) plaintiff or anyone  
2 else or otherwise engaged in conduct of a discriminatory and  
3 disparate treatment with respect to plaintiff or anyone else.

4 42. All documents and notes from or by Mr. Dixon McKenzie  
5 regarding any complaint regarding public policy enforcement  
6 submitted to defendant's Manger of Human Resources, in relation  
7 to plaintiff during his employment with the defendant; and any  
8 documents evidencing any investigation launched consequently,  
9 its results or the outcome of any such investigation.

10 43. All documents and statement from Mr. Dixon McKenzie in  
11 regard to his involvement in any backroom meetings,  
12 orchestration of plaintiff's suspension which led to plaintiff  
13 termination on June 26, 2001.

14 44. All documents referring or relating to describing or  
15 explaining, any investigation by any individual or entity,  
16 including, without limitation, defendant and/or Continental  
17 Airlines, Inc., of any suggestion, allegation, charge or  
18 complaint that defendant or anyone else or otherwise engaged in  
19 conduct which discriminates against or otherwise disfavors any  
20 of the following: (1) persons of Middle Eastern origin; (2)  
21 persons hired by the company on Guam as opposed to persons hired  
22 from off island; or (3) Continental Airline, Inc.'s employees as  
23 opposed to Continental Micronesia Inc.'s employees.

24 45. All documents referring or relating to the  
25 administration and/or results of the management trainee program,

1 including documents showing those trainees who were promoted to  
2 management positions after undergoing the training program.

3 46. All documents referring or relating to defendant's  
4 knowledge of Mr. Dixon McKenzie, Mr. James Hammer, Mr. William  
5 Herrera and Mr. Glenn Mendoza prior employment record,  
6 including, without limitation, those referring or relating to  
7 any prior claims that any one of them was involved in any kinds  
8 of discrimination and/or harassment of employees at his current  
9 or prior places of employment.

10 47. All documents referring or relating to defendant's  
11 knowledge of Mr. Sherman Thompson's prior employment in either  
12 civil employment and armed forces of the United States of  
13 America, including demotion due to sexual harassment of a female  
14 in Anderson Air Force Base and any other female in the armed  
15 forces or elsewhere, including any female which employed at  
16 Continental Micronesia Inc., while Mr. Sherman Thompson was  
17 employed by the defendant.

18 48. All documents presented for signature to, or prepared  
19 for signature by, any employee, manager, supervisor,  
20 administrator, officer or director of defendant relating to  
21 alleged discrimination, harassment or any other conduct of  
22 discriminatory nature by Mr. Dixon McKenzie and Mr. James  
23 Hammer.

24 49. All documents presented for signature to, or prepared  
25 for signature by, any employee relating to any claims, charges,

1 allegations or complaints (however characterized) alleging  
2 racial or national origin discrimination or any other kind of  
3 discrimination by defendant or any of its employees.

4 50. All surveillance videos, tapes, movies, photos, notes,  
5 memoranda, tape recordings, reports, whether electronic, digital  
6 or analogue, or any other recording, documents or things  
7 regarding, pertaining or relating to surveillance of the  
8 plaintiff at the direction of defendant or anyone acting on its  
9 behalf.

10 51. All documents, including, without limitation, notes,  
11 tape recordings, diary entries, calendars, meetings' minutes or  
12 meetings' notes, notes of or relating to communications, or any  
13 other writing, recording or memorialization prepared or  
14 received by defendant, or by any employee, representative or  
15 agent relating to any of the events and circumstances alleged in  
16 plaintiff's complaint and/or amended complaint.

17 52. All documents, referring or relating to any surveys  
18 conducted by defendant or any of its employees of attitudes of  
19 its employees.

20 53. All copies of letters sent by plaintiff to Mr. Bill  
21 Meehan, including, without limitation, any copies which have had  
22 written notes on them.

23 54. All copies of letter sent by plaintiff to Mr. Dixon  
24 McKenzie in regards to plaintiff complaining about disparate  
25

1 treatment and racial discrimination that Mr. Glenn Mendoza was  
2 administrating on the non pacific islanders.

3 55. All copies of the shift supervisors schedule on duty  
4 and off duty schedule for the entire line maintenance supervisor  
5 for period of January 1, 2001 to July 30, 2001.

6 56. All documents which were reviewed or used by defendant  
7 in preparing its answers to complaint and amended complaints.

8 57. (a) All documents listed by defendant in its Initial  
9 Disclosure (served on plaintiff on May 30, 2003) in this matter;  
10 and (b) Any and all insurance policies, referred to as  
11 "insurance coverage" on page 2, of Initial Disclosure (served on  
12 plaintiff on May 30, 2003) in this matter, regardless of the  
13 alleged deductible.

14 58. All statements made by any person regarding plaintiff.

15 59. All correspondence from or to defendant, its agents,  
16 representatives or employees regarding plaintiff, or any member  
17 of his family, or regarding his allegations, complaint or any  
18 other matter or issue related to plaintiff of\ r any member of  
19 his family.

20 60. All other documents from or to defendant, its agents,  
21 representatives or employees regarding plaintiff, or any member  
22 of his family, or regarding his allegations, complaint or any  
23 other matter or issue related to plaintiff of\ r any member of  
24 his family.

25 Date:

Jun/16/2003

Respectfully submitted,

